

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO**

)
In re POLYURETHANE FOAM ANTITRUST)
LITIGATION)
_____)
_____) MDL Docket No. 2196
This document relates to:) Index No. 10-MD-2196 (JZ)
_____)
ALL INDIRECT PURCHASER CLASS ACTIONS)
_____)

**INDIRECT PURCHASER PLAINTIFFS CLASS' REPLY IN SUPPORT
OF ITS DAUBERT MOTION TO EXCLUDE THE LIMITED
SUPPLEMENTAL EXPERT REPORT OF PETER R. GREENHALGH
AND ANY TESTIMONY REGARDING ITS SUBJECT MATTER**

In further support of the Indirect Purchaser Plaintiffs Class' (IPPs') *Daubert* Motion To Exclude The Report And Testimony Of Earl J. Silbert And To Exclude The Limited Supplemental Expert Report Of Peter R. Greenhalgh And Any Testimony Regarding Its Subject Matter (Doc. 1686), the IPPs hereby adopt the arguments made in the Sealy Plaintiffs' Reply In Support Of Their Motion To Exclude Report And Testimony Of Mr. Greenhalgh (Doc. 1755), which was filed in response to FXI'S Opposition To Sealy, Spring Air And Indirect Purchaser Plaintiffs' Motions To Exclude Report And Testimony Of Mr. Greenhalgh. (Doc. 1722).

Dated: June 29, 2015

Respectfully submitted,

/s/ Marvin A. Miller

Marvin A. Miller

Matthew E. Van Tine

MILLER LAW LLC

115 S. LaSalle Street, Suite 2910

Chicago, IL 60603

Tele: (312) 332-3400

Email: MMiller@MillerLawLLC.com

MVanTine@MillerLawLLC.com

Indirect Purchasers Plaintiffs Class Counsel

Richard M. Kerger (0015864)
KERGER & HARTMAN, LLC
33 S. Michigan Street, Suite 100
Toledo, OH 43604
Telephone: (419) 255-5990
Fax: (419) 255-5997
Email: Rkerger@kergerlaw.com

Executive Committee for Indirect Purchasers

Jay B. Shapiro
Samuel O. Patmore
Matthew Dates
STEARNS WEAVER MILLER WEISSLER ALHADEFF & SITTERSON, P.A.
150 West Flagler Street
Miami, Florida 33130
(305) 789-3200
Email: JShapiro@stearnsweaver.com
SPalmore@stearnsweaver.com
MDates@stearnsweaver.com

Eric D. Barton
WAGSTAFF CARTMELL
4740 Grand Avenue, Suite 300
Kansas City, MO 64112
(816) 701-1100
Email: EBarton@wagstaffcartmell.com

Shpetim Ademi
Guri Ademi
David Syrios
ADEMI & O'REILLY, LLP
3620 East Layton Avenue
Cudahy, Wisconsin 53110
(414) 482-8000
Email: SAdemi@ademilaw.com
GAdemi@ademilaw.com
DSyrios@ademilaw.com

Martin D. Holmes
DICKINSON WRIGHT PLLC
424 Church Street
Suite 1401
Nashville, TN 37219
(615) 244-6538
Email: MDHolmes@dickinsonwright.com

Avidan J. Stern
LYNCH & STERN LLP
150 South Wacker Drive
Suite 2600
Chicago, IL 60606
(312) 346-1600
Email: Avi@lynchandstern.com

David Schiller
SCHILLER & SCHILLER, PLLC
Professional Park at Pleasant Valley
5540 Munford Road • Suite 101
Raleigh, North Carolina 27612
Telephone: (919) 789-4677
Email: DSchiller@yahoo.com

Susan Bernstein
Attorney at Law
200 Highland Avenue, Suite 306
Needham, MA 02494
Telephone: (781) 290-5858
Email: Susan@sabernlaw.com

Counsel for Indirect Purchaser Plaintiffs

CERTIFICATE OF SERVICE

I certify that on June 29, 2015, I caused a true and correct copy of the foregoing document to be served on counsel via ECF.

/s/ Marvin A. Miller
Marvin A. Miller